

From: [Jennifer Gaines](#)  
To: [Gaines.jennifer@epa.gov](mailto:Gaines.jennifer@epa.gov)  
Subject: Fw: ASSESSMENT  
Date: 06/06/2012 07:43 AM  
Attachments: [Rodenticides Mitigation Decision.pdf](#)

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Jennifer Gaines  
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Insecticide-Rodenticide Branch  
Registration Division (7505P)

Tel: 703 305-5967  
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----- Forwarded by Jennifer Gaines/DC/USEPA/US on 06/06/2012 07:39 AM -----

From: Laura Parsons/DC/USEPA/US  
To: "David P. GRIFFITHS" <dgriffiths@arquim.com.ar>  
Cc: Jennifer Gaines/DC/USEPA/US@EPA, John Hebert/DC/USEPA/US@EPA, Russell Wasem/DC/USEPA/US@EPA  
Date: 08/03/2009 09:29 AM  
Subject: RE: ASSESSMENT

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Mr. Griffiths,

Here is the entire decision document from our public docket. I believe the summary beginning on page 17 will be the most helpful to you.

Best regards,  
Laura Parsons



Rodenticides Mitigation Decision.pdf

▼ "David P. GRIFFITHS" ---07/31/2009 12:20:59 PM---Dear Mrs Parsons, Thanyou very much for your reply.-

From: "David P. GRIFFITHS" <dgriffiths@arquim.com.ar>  
To: Laura Parsons/DC/USEPA/US@EPA  
Cc: Russell Wasem/DC/USEPA/US@EPA, John Hebert/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA  
Date: 07/31/2009 12:20 PM  
Subject: RE: ASSESSMENT

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Dear Mrs Parsons,  
Thank you very much for your reply.-  
Sorry to ask you one more thing! Could you mail me mitigation requirements published  
May 2008, or tell me how I can have access to them?  
If at anytime I can be of help to you in this part of the world I would only  
be too pleased to do so.  
Kindest regards,  
David

-----Mensaje original-----

De: Parsons.Laura@epamail.epa.gov [mailto:Parsons.Laura@epamail.epa.gov]  
Enviado el: Viernes, 31 de Julio de 2009 01:03 p.m.  
Para: David P. GRIFFITHS  
CC: Wasem.Russell@epamail.epa.gov; Hebert.John@epamail.epa.gov;  
Gaines.Jennifer@epamail.epa.gov  
Asunto: RE: ASSESMENT

Mr Griffiths,

Our mitigation requirements published in May, 2008 are final, but EPA  
has given a timeline of up to June 2011 for manufacturers to sell under  
the old labels in order to provide time for the considerable changes  
that we are requiring for the products. In most cases, our  
manufacturers who sell to individual consumers are completely changing  
their products including switching active ingredients and changing  
formulations.

We have prohibited the sales of more toxic anti-coagulants on the  
homeowner market, but are still allowing warfarin to be sold in the  
homeowner market. We are not allowing loose (pellet or meal) baits  
for the homeowner market since rodents move pellets and children can  
shake pellets out of bait stations. We are requiring bait stations to  
be used with the products.

We have not prohibited the use of grains, but we are requiring that the  
grains be pressed into a solid block.

I am not sure what kind of argument you could put forward, but perhaps  
this information provided above will help you.

Best regards,  
Laura Parsons  
Office of Pesticide Programs

From: "David P. GRIFFITHS" <dgriffiths@arquim.com.ar>

To: Laura Parsons/DC/USEPA/US@EPA

Date: 07/28/2009 02:14 PM

Subject: RE: ASSESMENT

Dear Laura,